

ROOSEVELT COUNTY, MONTANA

**Instructions for using the attached Crosswalk Reference Document
for Review and Submission of Local Mitigation Plans**

Attached is a crosswalk reference document, which is based on the Final Draft Report ***State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000***, published by FEMA HQ and dated July 11, 2002. This document was based on the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Parts 201 and 206 Interim Final Rule*, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the *State and Local Plan Interim Criteria* document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the *44 CFR Parts 201 and 206 Interim Final Rule*.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

to the State Hazard Mitigation Officer and FEMA Regional Office

Local Mitigation Plan Review and Approval Status

Local Requirement		
Local Plan Submitted to the State by:	Title:	Date:
Dan Sietsema	Roosevelt County DES Coordinator	July 2, 2003

State Requirement		
State Reviewer:	Title:	Date:
Larry Akers	SHMO	November 17, 2003

FEMA Requirement		
FEMA Reviewer:	Title:	Date:
KC Collins, URS	Planner	December 6, 2004
Wade Nofziger	Hazard Mitigation Specialist	July 30, 2004
Diana Heyder	Hazard Mitigation Specialist	December 20, 2004
Marty Kientz	Hazard Mitigation Specialist	July 20, 2004
Date Received in FEMA Region VIII	July 13, 2004	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	December 20, 2004	

Point of Contact: Dan Sietsema	Local Plan Reviewed by: Rich Petaja	
Title: Roosevelt County DES Coordinator	Title: HMGO DES	
Agency: Roosevelt County	NFIP Status (Single Jurisdiction)	
Phone Number: 406-653-6224	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

Multi-jurisdiction: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (If yes, list each jurisdiction below:)	N/A*	NFIP Status (for mapped communities)	
1. Roosevelt County, MT (Good Standing – mapped 11/1/96)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
2. Town of Bainville, MT (Never Mapped)	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input checked="" type="checkbox"/>
3. Town of Brockton, MT (Never Mapped)	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input checked="" type="checkbox"/>
4. Town of Culbertson, MT (Good Standing – mapped 5/15/86)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
5. Town of Froid, MT (Never Mapped)	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input checked="" type="checkbox"/>
6. Town of Poplar, MT (Never Mapped)	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input checked="" type="checkbox"/>
7. Town of Wolf Point, MT (Never Mapped)	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input checked="" type="checkbox"/>
8.	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
9.	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
[ATTACH PAGE (S) WITH ADDITIONAL JURISDICTIONS]			

Local Plan POC: Please complete the information requested on this profile form. The form will be submitted with your plan to the State. Using the attached crosswalk, compare your local plan content with the criteria outlined. Please note under the column heading “Location in the Plan” the page(s) where your plan addresses/meets the criteria. Thank you.
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* Not applicable for communities not mapped and/or who do not have an identified flood risk.

LOCAL HAZARD MITIGATION PLAN REVIEW – ROOSEVELT COUNTY, MT
REGION VIII, DECEMBER 20, 2004 – PAGE 3

LOCAL MITIGATION PLAN SUMMARY WORKSHEET

The plan cannot be reviewed if the prerequisite is not met for a single jurisdictional plan, or prerequisites are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of “**Satisfactory**” or “**Outstanding**” for the plan to receive FEMA approval. A less than “Satisfactory” score on subsections highlighted in gray will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “**Needs Improvement**” score.

SCORING SYSTEM

Please check one of the following for each requirement.

U – Unsatisfactory: The plan does not address the criteria.

N – Needs Improvement: The plan addresses the criteria, but needs significant improvement. Reviewer’s comments must be provided.

S – Satisfactory: The plan meets the minimum criteria. Reviewer’s comments are encouraged, but not required.

O – Outstanding: The plan exceeds the minimum criteria. Reviewer’s comments are encouraged, but not required.

Prerequisite (s) (Check Applicable Box)

Adoption by the Local Governing Body:
§201.6(c)(5) **OR**

Multi-jurisdictional Plan Adoption: §201.6(c)(5)
AND

Multi-jurisdictional Participation: §201.6(a)(3)

NOT MET	MET
	N/A
	X
	X

Planning Process

Documentation of the Planning Process:
§201.6(c)(1)

U	N	S	O
		X	

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i)

Profiling Hazard Events: §201.6(c)(2)(i)

Assessing Vulnerability: Overview: §201.6(c)(2)(ii)

Assessing Vulnerability: Identifying Assets:
§201.6(c)(2)(ii)(A)

Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-jurisdictional Risk Assessment:
§201.6(c)(2)(iii)

U	N	S	O
		X	
		X	
		X	
		X	
		X	
		X	

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i)

Identification and Analysis of Mitigation Measures:
§201.6(c)(3)(ii)

Implementation of Mitigation Measures:
§201.6(c)(3)(iii)

Multi-jurisdictional Mitigation Strategy:
§201.6(c)(3)(iv)

U	N	S	O
		X	
		X	
		X	
		X	

Plan Maintenance Procedures

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i)

Implementation Through Existing Programs:
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

U	N	S	O
		X	
		X	
		X	

Additional State Requirements*

Insert State Requirement

Insert State Requirement

Insert State Requirement

U	N	S	O

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED

XXX

*States that have additional requirements can add them in the appropriate sections of the *Plan Review Criteria* or create a new section. States need then modify this worksheet to record the score for those requirements.

See Reviewer’s Comments

LOCAL HAZARD MITIGATION PLAN REVIEW - ROOSEVELT COUNTY, MT
REGION VIII, DECEMBER 20, 2004 - PAGE 4

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS <u>SCORING SYSTEM</u> MET/NOT MET (FOR PREREQUISITE (S) ONLY) U--UNSATISFACTORY N--NEEDS IMPROVEMENT	S--SATISFACTORY O--OUTSTANDING
PREREQUISITE (S) (3-1)			<i>NOTE: The prerequisite, or prerequisites in the case of multi-jurisdictional plans, must be met before the plan can be approved.</i>	
Adoption by the Local Governing Body (3-2)	Requirement §201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)...	Introduction, page 1 and Appendix A	S	The included resolution for the County of Roosevelt is signed and dated November 24, 2003. The introduction section of the plan highlights the adoption process that took place in the county.
OR				
Multi-Jurisdictional Plan Adoption (3-3)	Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Introduction, page 1 and Appendix A	S	Adopted and dated resolutions for the Towns of Bainville, Brockton, Culbertson, Froid, Poplar, Wolf Point are provided in the plan. The introduction section of the plan highlights the adoption process that took place in the participating communities. Adopted by all jurisdictions.
AND				
Multi-Jurisdictional Planning Participation (3-4)	Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process... Statewide plans will not be	Introduction Page 1, Appendix B	S	According to the plan a collaborative process involving county and local governments was implemented. Input was requested from these members and information in the form of documents, and maps were provided during the planning process. A contact list of government officials from each adopting town government is provided.

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	accepted as multi-jurisdictional plans.		Documentation indicating the participation of all adopting communities is provided.
PLANNING PROCESS (3-5)			
Documentation of the Planning Process (3-6)	Requirement §201.6(c)(1): [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	2.0 Planning Process, page 7 and 8 and Appendix B.	S A collaborative process was used to bring stakeholders and the public into the planning process. The County in cooperation with the Montana DES and Maxim Technologies, a hazard mitigation contractor, put together a contact list of government officials and stakeholders that were needed for developing the plan. During the planning process, contacts were initially informed of their importance and role in the planning process and then were provided information such as mitigation and strategy documents, maps, and meeting notifications. Additionally, interviews were held with government and stakeholders interested in hazard mitigation. Three public meetings were held during the initial plan development. The meetings were open to the stakeholders and the public. The main purpose was to gather information on historic disasters, identify critical facilities for that area, and gather information about mitigation goals and objectives. Additionally, meetings during the plan development were held throughout the county with specific jurisdiction officials, state and federal representatives and

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			<p>relevant stakeholders. Attendee lists and meeting summaries are provided in the plan appendix.</p> <p>Review of the final draft was made available to the public, stakeholders and government officials at several meetings. Comments that were received from the meetings were then forward to the contractor for review and incorporation in to the final plan. The final plan was then forwarded on to the Montana DES SHMO and the Montana FEMA representative for final review before submission to FEMA.</p>
RISK ASSESSMENT (3-9)			
Identifying Hazards (3-10)	Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the type...of all natural hazards that can affect the jurisdiction...	Page 28 –Table 3-8	S Table 3-8 lists all the hazards that have potential to impact the county that were discussed during the planning process. They had a very thorough review of the hazards.
Profiling Hazard Events (3-14)	Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the...location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous	Section 3.0 Hazard Evaluation and Risk Assessment pages 9-27.	S They have done a good job in profiling each of the identified hazards. Each hazard specific section includes information a detailed narrative on the hazard, location, extent and history of events when available. Many of the hazards are profiled by a GIS map displaying geographical extent of the hazard risk area in relation to critical facilities.

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	occurrences of hazard events and on the probability of future hazard events.		<p>A review of the SHELDUS database at www.sheldus.org indicated that the historical data on events provided in the plan by the county is actually more comprehensive although, for future updates SHELDUS can provide supplemental information on property damage loss, fatalities, injuries, and crop damage loss. Wildfires have contributed to the most property damage losses according to SHELDUS with flooding causing the second most property damage. It appears this data, or NWS data with similar findings was referred to in Appendix G. It is suggested that SHELDUS data be incorporated into the next revision.</p>
Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the <i>Plan Criteria</i>)	Requirement 201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction’s vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	Pages 33-43	<p>S A vulnerability assessment is provided within each hazard profile. Level of risk, affected populations, and impacted structures and infrastructure are addressed. A vulnerability ranking was then applied to each identified hazard that is based frequency, magnitude, building \$ exposure, effected population and critical facilities at risk. Considering this is a very rural area, the county has done a great job in assessing the vulnerabilities from each profiled hazard.</p> <p>HAZUS data indicates that one toxic release site is located in the county – Montola Growers Inc. in Culbertson. See http://www.epa.gov/triexplorer/facility.htm for more information.</p>

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Assessing Vulnerability: Identifying Assets (3-18)	Requirement 201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas...	Pages 28 – 31, Map 3-1. Appendix C, Page 50	<p>S The plan does a great job of both listing critical facilities and identifying existing and future buildings in both text and maps.</p> <p>The County is developing a comprehensive growth policy where goals and objectives will agree with the PDM projects identified in this plan.</p> <p>Information on land use and future development, future growth in relation to the identified hazard areas is described in the plan. The plan indicates that although local officials have indicated that there are no plans to develop buildings, infrastructure or critical facilities in hazard prone areas, mitigation options will be considered in future land use decisions. Mapping the future development projects would enhance the plan.</p> <p><i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i></p>

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Assessing Vulnerability: Estimating Potential Losses (3-22)	Requirement 201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate...	Page 29, Appendix E	S The Vulnerability Assessment Methodology does an excellent job of indicating how dollar losses were estimated based on FEMA HAZUS software with data sources provided in Appendix E. Mapping and tables highlight vulnerability for hazard types based on building \$ risk, societal risk (populations potentially affected) and critical facilities risk. <i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i>
Assessing Vulnerability: Analyzing Development Trends (3-24)	Requirement 201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	Pages 29-31	S The county is developing a Comprehensive Growth Policy. The plan outlines future growth and land use trends within the county and how county building department will administer building codes in local communities that comply with the state's building codes. The plan also identifies known future projects. <i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i>
Multi-Jurisdictional Risk Assessment (3-26)	Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.	Pages 31-43	S The plan does an excellent job of layering GIS data starting from building locations, to population density and then the hazard type. The plan goes as far as to include close-ups maps for all the jurisdictions seeking plan approval as well as individual vulnerability tables for each jurisdiction.

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MITIGATION STRATEGY (3-29)			<i>Note: Any changes made in the risk assessment to address previous unsatisfactory or needs improvement scores, will need to be reflected in the Mitigation Strategy section to gain final approval of the plan.</i>
Local Hazard Mitigation Goals (3-30)	Requirement §201.6(c)(3)(i): [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Page 44	S Seven general mitigation goals are presented that will reduce or avoid long-term vulnerabilities. Each goal then has specific actions that correspond to the goals.
Identification and Analysis of Mitigation Measures (3-34)	Requirement §201.6(c)(3)(ii): [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	Pages 44-46	S A comprehensive range of mitigation strategies (projects) are provided in the plan. Both existing and future buildings and infrastructure benefit from the mitigation actions identified in the plan.
Implementation of Mitigation Measures (3-36)	Requirement §201.6(c)(3)(iii): [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local	Pages 45-49	S The mitigation actions presented in the plan along with a description of how projects will be prioritized based on impacts to the population, property and the cost. Projects were ranked in total as high, medium or low. Benefits to the protection of property and population are weighed against cost; thereby serving as a benefit cost review. The

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	jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.		administration of the projects will be the responsibility of the DES coordinator. The plan would be enhanced if the time frame, responsible agency, cost and potential funding source were provided for each hazard mitigation project.
Multi-jurisdictional Mitigation Strategy (3-40)	Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Pages 45-49	S Table 4-2 lists the hazard mitigation projects and highlights specific communities where projects will take place when applicable. Some projects are county-wide while others are specific to local jurisdictions.
PLAN MAINTENANCE PROCEDURES (3-43)			
Monitoring, Evaluating, and Updating the Plan (3-44)	Requirement §201.6(c)(4)(i): [The plan maintenance process shall include a section describing the] method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.	Pages 50-51	S The plan will be reviewed every two years initiated by the DES Coordinator and updated by the board of commissioners with the assistance of the LEPC and the public. The DES Coordinator will provide project status reports to the board of commissioners, the LEPC and the public as well. The DES Coordinator will be responsible for the five year plan update and will have six months to make appropriate changes prior to submitting it to the Board, LEPC and the public for finalization.

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Implementation Through Existing Programs (3-48)	Requirement §201.6(c)(4)(ii): [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate...	Pages 50-51, Page 46	S The projects identified in this plan will be linked to goals identified in the developing Comprehensive Growth Policy Plan for the County. The plan indicates that the county will have the opportunity to implement this plan through existing programs and procedures. The plan would be enhanced by identifying these existing programs and procedures and including a discussion on local capital improvement programs. Page 46 does provide suggestions for integrating this plan into the state's and county's legal framework.	
Continued Public Involvement (3-50)	Requirement §201.6(c)(4)(iii): [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.	Page 51	S Copies of the plan will be available at all appropriate agencies in the county and at the public library. The existence and location of copies will be made known through local newspaper notifications. The phone number and location of the DES Coordinator is provided in the plan. Public meetings will be held prior to the two and five-year updates to give the public an opportunity to be involved and comment.	
ADDITIONAL STATE REQUIREMENTS			<i>States that have additional requirements can add them in the appropriate sections of the Plan Review Criteria or create a new section. States need then modify this worksheet to record the score for those requirements.</i>	
	Insert State Requirement (s)			